

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO, as representative of

COMMONWEALTH OF PUERTO
RICO.¹

Debtor

CASE NO.: 17-03283 (LTS)

TITLE III; PUERTO RICO
OVERSIGHT, MANGEMENT AND
ECONOMIC STABILITY ACT
(PROMESA)

**MOTION TO INFORM APPEARANCE OF CANTOR-KATZ COLLATERAL
MONITOR LLC AT JUNE 17, 2022 HTA DISCLOSURE STATEMENT HEARING**

TO THE HONORABLE COURT:

COME NOW Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company which serves as the collateral monitor for Wilmington Trust, N.A. in connection with the new bonds issued by the GDB Debt Recovery Authority (the “DRA”) pursuant to the *Government Development Bank for Puerto Rico Debt Restructuring Act*, Act No. 109-2017, as amended by Act No. 147-2018 and the approved Qualifying Modification for the Government Development Bank for Puerto Rico² under Title VI of the *Puerto Rico Oversight, Management and Economic Stability Act* (the “Collateral Monitor”), by and through the undersigned legal counsel, hereby submits this

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) and (vi) Puerto Rico Building Authority (“PBA”) Bankruptcy Case No.: 19-BK-5523 (LTS) (Last Four Digits of Federal Tax ID: 3801).

² See Dkt. No. 270 of Civil Case No. 18-01561 (LTS).

motion to inform (the “Informative Motion”) pursuant to this Honorable Court’s *Order Regarding Procedures For June 17, 2022, Disclosure Statement Hearing* [Dkt. No. 21068] (the “Procedures Order”),³ and respectfully states as follows:

1. Douglas I. Koff and Peter J. Amend of Schulte Roth & Zabel LLP will appear on behalf of the Collateral Monitor at the Hearing, which will be conducted via Zoom in accordance with the Procedures Order. As required by the Procedures Order, a Party Appearance Sheet is annexed hereto as Exhibit A.

2. Carmen D. Conde Torres, Esq. and Luisa S. Valle Castro, Esq. of C. Conde & Assoc., as local counsel for the Collateral Monitor, may attend the Hearing through the listen-in access lines provided by the Court.

3. Furthermore, the Collateral Monitor reserves the right to be heard and present oral argument to address any matter identified in the agenda to be filed by the Oversight Board in connection with the Hearing, or raised by any party at the Hearing related to the Title III cases or any adversary proceeding which may affect the interests of the DRA. For the avoidance of doubt, such matters shall include, but not be limited to, the following:

- a. *Disclosure Statement for the Amended Title III Plan of Adjustment for the Puerto Rico Highways and Transportation Authority* [Dkt. No. 20839];
- b. *Amended Title III Plan of Adjustment of the Puerto Rico Highways and Transportation Authority* [Dkt. No. 20828];
- c. *Motion of the Puerto Rico Highways and Transportation Authority for an Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* [Dkt. No. 20655];
- d. *Motion of the Puerto Rico Highways and Transportation Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving Forms of Ballots,*

³ Capitalized terms used herein and otherwise not defined shall have the meaning ascribed to such term in the Procedures Order.

and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures [Dkt. No. 20654];

e. Notice of Filing of Revised Proposed Order (I) Scheduling a Hearing to Consider the adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief [Dkt. No. 20673]; and/or

f. Any other filing or document related to any of the foregoing.

5. The Collateral Monitor reserves the right to amend this Informative Motion as needed.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 8th day of June, 2022.

WE HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties appearing in said system including the US Trustee and to all those parties registered to receive notice within the electronic notification service.

C. CONDE & ASSOC. LAW OFFICES

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***Attorneys for Cantor-Katz Collateral Monitor LLC, as
Collateral Monitor for GDB Debt Recovery Authority***

Exhibit A
Party Appearance Sheet

Name of Party	Cantor-Katz Collateral Monitor LLC
Party Name Abbreviation (For Use with Zoom)	Cantor-Katz
Hearing Participant Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party): <ul style="list-style-type: none">• Name,• Email,• Law Firm,• Phone Number and• Docket Entry No. for the Attorney's Notice of Appearance	Douglas I. Koff douglas.koff@srz.com Schulte Roth & Zabel LLP (212) 756-2000 [Dkt. No. 15299] -and- Peter J. Amend peter.amend@srz.com Schulte Roth & Zabel LLP (212) 756-2000 [Dkt. No. 6976]
If a Party files a supplemental Party Appearance Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a "Supplemental" Party Appearance Sheet.	
Note: Pursuant to the Procedures Order ¶ 1, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other party-in-interest shall be limited to 2 attorneys at any given time.	